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May 18, 1994

DELIVERY BY HAND

Mr. Richard Metzger
Acting Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 500
Washington, D.C. 20554

RECEIVED

MAY 18 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 92-166

Dear Mr. Metzger:

Motorola Satellite Communications, Inc. ("Motorola"), hereby submits this letter in opposition to the request of Constellation Communications, Inc. for a one month extension of time to submit reply comments in the above-referenced proceeding.

This request comes on the heels of a request for a two week extension of time filed by TRW, Inc. Motorola opposed that request, and for the same reasons it articulated in opposition to TRW's request, cannot agree to Constellation's requested extension. In this regard, Motorola completely agrees with Loral/QUALCOMM Partnership, L.P. ("LQP") that Constellation has not provided any substantial reason for changing the Commission's schedule for submitting reply comments in this proceeding.

Applications for authority to construct low-Earth orbit ("LEO") mobile satellite systems have been pending for well over three years. Motorola filed its application for the IRIDIUM system in December 1990. Since that time, Motorola has been an active participant in all of the proceedings relating to the allocation of MSS spectrum and the licensing of global mobile satellite systems, including the negotiated rulemaking proceeding and the Commission's Notice of Proposed Rulemaking, 9 FCC Rcd. 1094 (1994). Motorola filed extensive comments on May 5, 1994, in response to the proposals contained in the Notice.

Motorola can appreciate that much work will have to be done between now and the time that reply comments are due in this proceeding; however, the Commission should not countenance any unnecessary delays in the already lengthy regulatory process.

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Motorola is prepared to devote the necessary resources to review the initial round of comments in this proceeding as well as respond to the Commission's Notice of Inquiry in IC Docket No. 94-31, and respectfully submits that any other applicant serious about moving the licensing process forward should do so as well.

Moreover, while Motorola is certainly willing to work hard over the next weeks and months toward reaching a settlement with the other parties in this proceeding, it believes that settlement discussions would be furthered by having a complete record of all comments and reply comments filed at the Commission at the earliest possible time.

Thank you for your prompt consideration of this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "P. Malet", written in a cursive style.

Philip L. Malet

Counsel for Motorola Satellite
Communications, Inc.

cc: Attached Service List

CERTIFICATE OF SERVICE

I, Philip L. Malet, hereby certify that copies of the foregoing letter was served by first-class mail, postage prepaid, this 18th day of May 1994, on the following persons:

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